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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER  
IN SUPPORT OF DEFENDANT META  
PLATFORMS, INC.'S REPLY IN  
SUPPORT OF MOTION TO EXCLUDE  
EXPERT TESTIMONY AND OPINIONS  
OF NICHOLAS ECONOMIDES**

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I  
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this  
4 declaration in support of Meta's Reply Memorandum in Support of Motion to Exclude Expert  
5 Testimony and Opinions of Nicholas Economides.

6 2. Attached hereto as Exhibit 16 is a true and correct copy of excerpts of the  
7 transcript from Nicholas Economides's deposition held on September 14, 2023. Other excerpts  
8 from this transcript were previously attached as Exhibit 3 to my first declaration in support of  
9 this Motion. Dkts. 804-1, 803-4.

10 3. Attached hereto as Exhibit 17 is a true and correct copy of excerpts of the  
11 transcript from Nicholas Economides's deposition held on March 15, 2024. Other excerpts from  
12 this transcript were previously attached as Exhibit 1 to my first declaration in support of this  
13 Motion. Dkts. 804-1, 803-2.

14 4. Attached hereto as Exhibit 18 is a true and correct copy of excerpts from the  
15 Expert Rebuttal Report of Anindya Ghose, dated February 9, 2024.

16 I declare that the foregoing is true and correct under penalty of perjury.

17 Executed on this 15th day of July, 2024, in Bar Harbor, ME.

18  
19 By: /s/ David Z. Gringer  
20 David Z. Gringer

21 **SIGNATURE ATTESTATION**

22 This document is being filed through the Electronic Case Filing (ECF) system by attorney  
23 Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing  
24 of this document from each of the attorneys identified on the caption page and in the above  
25 signature block.  
26

27 By: /s/ Sonal N. Mehta  
28 Sonal N. Mehta